

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION

UNITED STATES OF AMERICA

I N D I C T M E N T

v.

Case No. \_\_\_\_\_

ALEXANDER ROBERT McMANUS

Violation: 18 U.S.C. §§ 2252A(a)(2)(A),  
2252A(a)(5)(B), 2252A(b)(1),  
2252A(b)(2), and 2253(a)

COUNT ONE

**Receipt of Materials Containing Child Pornography**

The Grand Jury Charges:

In or about September 2014 and continuing until April 17, 2016, in the District of North Dakota, and elsewhere,

ALEXANDER ROBERT McMANUS

knowingly distributed and received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; specifically, using an Acer laptop computer, SN: LXRJY0205814905FBF1601, ALEXANDER ROBERT McMANUS distributed and received numerous electronic files, which files contained minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT TWO

**Possession of Materials Containing Child Pornography**

The Grand Jury Further Charges:

In or about September 2014 and continuing until April 17, 2016, in the District of North Dakota, and elsewhere,

ALEXANDER ROBERT McMANUS

knowingly possessed and accessed with intent to view, material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor that had not attained 12 years of age, and which had been transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, ALEXANDER ROBERT McMANUS knowingly possessed electronic files on a Lexar USB 16GB flash drive, SN: AAE7FQ7NUIXJE2AA, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT THREE

**Possession of Materials Containing Child Pornography**

The Grand Jury Further Charges:

In or about September 2014 and continuing until April 17, 2016, in the District of North Dakota, and elsewhere,

ALEXANDER ROBERT McMANUS

knowingly possessed and accessed with intent to view material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor that had not attained 12 years of age, and which had been transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, ALEXANDER ROBERT McMANUS knowingly possessed electronic files on a Verizon LG cellular phone, Model VS-410PP, SN: 312CYLH0643656, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

**FORFEITURE ALLEGATION**

The Grand Jury Further Finds Probable Cause That:

Upon conviction for violating Title 18, United States Code, Section 2252A, as charged in this Indictment,

ALEXANDER ROBERT McMANUS

shall forfeit to the United States, any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violation, including, but not limited to, the following:

- Acer laptop computer, SN: LXRJY0205814905FBF1601
- Verizon LG cellular phone, Model VS-410PP,  
SN: 312CYLH0643656
- Lexar USB 16GB flash drive, SN: AAE7FQ7NUIXJE2AA

By virtue of the commission by defendant of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson \_\_\_\_\_  
FOREPERSON

/s/ Christopher C. Myers \_\_\_\_\_  
CHRISTOPHER C. MYERS  
United States Attorney

JKP:tla